

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MEMPHIS A. PHILIP RANDOLPH INSTITUTE,
THE EQUITY ALLIANCE, FREE HEARTS, THE
MEMPHIS AND WEST TENNESSEE AFL-CIO
CENTRAL LABOR COUNCIL, THE TENNESSEE
STATE CONFERENCE OF THE NAACP, SEKOU
FRANKLIN, and KENDRA LEE,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as Secretary
of State of the State of Tennessee, MARK GOINS, in
his official capacity as Coordinator of Elections for
the State of Tennessee, and AMY WEIRICH, in her
official capacity as the District Attorney General for
Shelby County, Tennessee,

Defendants.

Civil No. 3:20-cv-0374

JUDGE RICHARDSON
MAGISTRATE JUDGE FRENSLEY

**DECLARATION OF COREY DEWAYNE SWEET
(Pursuant to 28 U.S.C. § 1746)**

I, Corey DeWayne Sweet, am over the age of 18 and fully competent to make the following declaration. If called upon as a witness, I would testify to these facts. Under penalty of perjury, I declare and state the following:

1. I am twenty years old. I was born and raised in Memphis, Tennessee.
2. I joined Xavier University in Louisiana as a freshman student in August, 2018.
3. I lived in Louisiana during the Fall and Spring semesters and attended Xavier University until March 2020 when the University transitioned into online learning because of the COVID-19 pandemic. I finished the second semester of my sophomore year through remote learning.

4. Sometime around mid to late July, I transferred from Xavier University to the University of Memphis. The reason I transferred was because of the COVID-19 pandemic and my desire to stay at home instead of at an off-campus hotel (which was the accommodation that Xavier University was offering to out-of-state students) to limit exposure to the virus. The majority of my classes are remote. I have one lab for circuit and electrical analysis that takes place in person at the University and there are about 10 people in the lab. We all wear masks and take precautions.

5. I am a member of the Memphis Branch of the Tennessee State Conference of the NAACP. My grandmother is Gloria Sweet-Love, the president of the Tennessee State Conference of the NAACP.

6. On the day of the August 18, 2020 primary election, I was at home in Shelby County. I did not vote in the August 18 primary election. This is because I had remote class on August 18 for a significant part of the day and I did not have transportation and could not vote in person. I also did not vote in person because I do not want to become exposed to COVID-19.

7. I did not request an absentee mail-in ballot for the August 18 primary election because I am a first-time voter who registered to vote online and I understood that I have to vote in person the first time that I vote.

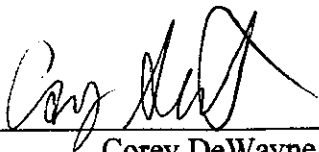
8. I understand that under the court's order, I would now be able to vote absentee in November even though it will be my first time voting so long as I am otherwise eligible. I also understand that without the court's order, I would not be able to vote absentee even if I am otherwise eligible because it will be my first time voting.

9. I understand that there are several eligibility criteria for voting absentee including illness, being out of county during the voting period, or jury duty. Since the election is still

nearly two months away, I don't know whether I will fall into any of these categories. I am particularly concerned that I could contract COVID-19 but be unable to vote absentee because of the first-time voter rule if this Court's order were not in effect.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 10th day of September, 2020.


Corey DeWayne Sweet